

**REBUTTAL TESTIMONY
OF
DAVID R. EICHENLAUB**

CASE NO. PUE010013

Q1. PLEASE STATE YOUR NAME AND POSITION WITH THE COMMISSION.

A1. My name is David R. Eichenlaub. I am Assistant Director in the Commission's Division of Economics and Finance.

Q2. DID YOU PREVIOUSLY FILE TESTIMONY ON MAY 1, 2001 IN THIS PROCEEDING?

A2. Yes, I did.

Q3. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A3. My testimony addresses certain issues raised in the prepared testimony of other parties regarding the Customer Information chapter of the Staff Report addressing proposed rules 20 VAC 5-312-60 B 1 and 20 VAC 5-312-60 B 2.¹

Q4. HAS THE STAFF REVISED ITS PROPOSED RETAIL ACCESS RULES SUBSEQUENT TO THE FILING OF PREPARED DIRECT TESTIMONY IN THIS PROCEEDING?

A4. Yes. Complying with the Commission's directive and considering the comments submitted by interested parties on its original proposal, the Staff submitted revised proposed retail access rules on May 4, 2001.

¹ Staff Report On Proposed Rules Governing Retail Access To Competitive Energy Services, Case No. PUE010013, March 13, 2001, pp. 46-51.

Q5. DO THE REVISIONS TO THE PROPOSED RETAIL ACCESS RULES AFFECT THE IDENTIFIED PROPOSED CUSTOMER INFORMATION RULES?

A5. Yes, Staff revised the language of Rules 20 VAC 5-312-60 B 1 and 20 VAC 5-312-60 B 2 to clarify the use of the mass list, the elements to be included on the mass list, and the customer authorization to release such elements. These revised proposed rules are shown in Attachment DRE-1.

Q6. WHAT IS STAFF'S POSITION REGARDING THE DEVELOPMENT AND USE OF THE MASS LIST?

A6. As supported by the direct testimony of Washington Gas Light Company witness Wagner and Dominion Virginia Power witness Koogler, Staff believes the mass list provides an opportunity to help foster a competitive energy market. Such a list enables competitive service providers (CSPs) to reach customers interested in choosing a supplier and to target marketing efforts. This list is particularly useful for CSPs, competing within utility service territories using a phased-in approach to retail access, to identify eligible customers. Although customer names and addresses may be obtained from a host of sources, the local distribution company (LDC) is the only source linking customers with particular utility service territories and providing customer information related to energy need and use.

Additionally, as stated in the Staff Report, the VAEDT developed and used a similar participant's list for the current electric pilot programs. This has proven useful to CSPs to solicit customers and for LDCs to minimize input errors during customer enrollment. Most parties agree the process should continue, at least during the transition to full retail access.

Staff understands the concerns regarding customer account numbers on a mass list but believes safeguards are in place to mitigate such concerns. Rules surrounding the customer notification letter sent from the LDC and the customer's 10-day rescission period should adequately protect the customer from unwanted switches to a CSP. Additionally, Staff attempted to clarify revised proposed Rule 20 VAC 5-312-60 B 1 and allow flexibility for an LDC to determine the type of identifier to share with CSPs while providing a cross-reference of customer accounts to minimize errors during customer enrollment. If an LDC still has concerns about releasing the customer account number, the LDC may establish a distinct identifier different from the customer account number to assist enrollment with a CSP and preserve the customer account number as a possible verification tool.

Q7. WHAT IS STAFF'S POSITION REGARDING THE "OPT-OUT" METHODOLOGY TO DEVELOP THE MASS LIST?

A7. Again, as supported by witnesses Wagner and Koogler, Staff believes the "opt-out" or "negative check-off" methodology is the better way to develop an effective mass list. This method is not new to customers as it is commonly practiced by many service companies and financial institutions as illustrated in Attachment DRE-2.

As stated in the Staff Report and supported by the Office of the Attorney General, the important thing to note is that customers may still make a choice and consciously decide whether or not to be included on the list to receive additional information regarding CSPs. The proposed rules require each LDC to provide its customers an opportunity to withhold customer information from the mass list. Customer education is essential in helping customers understand what action they must take and the consequences of such action. Staff does not believe a mass list

determined by an “opt-out” methodology conflicts with any privacy policy as the customer decides whether or not to be included on the list.

Staff believes that the same effort and resources will be necessary to create and maintain a shorter mass list, resulting from an “opt-in” approach envisioned by the Cooperatives², as to create a longer mass list as may be expected using the “opt-out” approach. The only difference between the two lists would be sheer volume, or the number of accounts identified on the list. Staff also proposes further clarification that a customer shall choose to release all of the data elements included on the mass list, or none of the data elements. Although permitting customers to determine which data elements are to be released may reduce the volume of the database, as suggested by the Cooperatives, the internal programming to track such a menu of customer options adds costly complexity to internal systems with no resulting benefit.

Q8. WHAT ARE YOUR CONCLUSIONS AND RECOMMENDATIONS?

A8. Staff recommends that the proposed rules 20 VAC 5-312-60 B 1 and 20 VAC 5-312-60 B 2, as modified in the Staff’s revised proposed rules filed with the Commission on May 4, 2001, are reasonable and necessary to help foster retail access to competitive energy services while balancing the interests of market participants and customers, and should be adopted.

Q9. DOES THIS CONCLUDE YOUR TESTIMONY?

² The Virginia Electric Cooperatives include A&N Electric Cooperative, BARC Electric Cooperative, Central Virginia Electric Cooperative, Community Electric Cooperative, Craig-Botetourt Electric Cooperative, Mecklenburg Electric Cooperative, Northern Neck Electric Cooperative, Inc., Northern Virginia Electric Cooperative, Powell Valley Electric Cooperative, Prince George Electric Cooperative, Rappahannock Electric Cooperative, Shenandoah Valley Electric Cooperative, Southside Electric Cooperative, Inc., and the Virginia, Maryland & Delaware Association of Electric Cooperatives.

A9. Yes.

REVISIONS TO SELECTED PROPOSED RULES

GOVERNING RETAIL ACCESS

TO COMPETITIVE ENERGY SERVICES

20 VAC 5-312-60. Customer Information.

B. The local distribution company shall provide, upon the request of a competitive service provider, a mass list of eligible customers. A competitive service provider shall adequately safeguard all of the information included on the mass list and shall not release such information unless the customer authorizes disclosure or unless the information to be disclosed is already in the public domain.

1. The mass list shall include the following customer information: (i) customer name; (ii) service address; (iii) billing address; (iv) either an account number, a service delivery point, or universal identifier, as applicable; (v) electricity or natural gas service identifier; (vi) meter reading date or cycle; (vii) wholesale delivery point, if applicable; (viii) rate class and subclass or rider, as applicable; (ix) load profile reference category, if not based on rate class; and (x) up to twelve months of cumulative historic energy usage and annual peak demand information as available.

2. Prior to releasing any information on the mass list, the local distribution company shall provide each customer the opportunity to have the information itemized in subdivision 1 of this subsection withheld, in total, from the mass list.

**REBUTTAL TESTIMONY
OF
THOMAS E. LAMM**

CASE NO. PUE010013

Q1. PLEASE STATE YOUR NAME, EMPLOYER, POSITION, AND ADDRESS.

A1. My name is Thomas E. Lamm. I am employed by the State Corporation Commission (“Commission”) as an Assistant Director in the Division of Energy Regulation. My business address is Virginia State Corporation Commission, Post Office Box 1197, Richmond, Virginia 23218.

Q2. ARE YOU THE SAME THOMAS E. LAMM WHO PREVIOUSLY FILED DIRECT TESTIMONY ON MAY 1, 2001, IN THIS PROCEEDING?

A2. Yes.

Q3. WHAT IS THE PURPOSE OF YOUR PREPARED REBUTTAL TESTIMONY?

A3. My testimony addresses the portions of the prepared direct testimony filed in this proceeding on May 1, 2001, by R. Glenwood Gillispie, Jr. on behalf of the Virginia Electric Cooperatives¹ (the “Cooperatives”) as it pertains to the

¹ The Virginia Electric Cooperatives include A&N Electric Cooperative, BARC Electric Cooperative, Central Virginia Electric Cooperative, Community Electric Cooperative, Craig-Botetourt Electric Cooperative, Mecklenburg Electric Cooperative, Northern Neck Electric Cooperative, Inc., Northern Virginia Electric Cooperative, Powell Valley Electric Cooperative, Prince George Electric Cooperative, Rappahannock Electric

Staff's proposed billing and payment retail access rules, section 20 VAC 5-312-90. Specifically, the testimony of Mr. Gillispie objects to the following proposed rule subsections: (1) 20 VAC 5-312-90 I 1; (2) 20 VAC 5-312-90 I 3; (3) 20 VAC 5-312-90 I 8 b; (4) 20 VAC 5-312-90 I 8 c; (5) 20 VAC 5-312-90 J 1; (6) 20 VAC 5-312-90 J 2; (7) 20 VAC 5-312-90 L; (8) 20 VAC 5-312-90 M; (9) 20 VAC 5-312-90 N; and (10) 20 VAC 5-312-90 O.

Q4. HAS THE STAFF REVISED ITS PROPOSED RETAIL ACCESS RULES SUBSEQUENT TO THE FILING OF PREPARED DIRECT TESTIMONY IN THIS PROCEEDING?

A4. Yes. In response to the Commission's Order Setting Hearing And Procedural Schedule, dated April 23, 2001, the Staff filed revised proposed retail access rules on May 4, 2001, reflecting consideration of the comments submitted by interested parties on the Staff's initial proposal. Attachment I reflects the Staff's revisions to the rules identified in my previous response.

Q5. DO THE REVISIONS ADDRESS THE CONCERNS EXPRESSED BY THE COOPERATIVES REGARDING THE IDENTIFIED PROPOSED BILLING AND PAYMENT RULES?

A5. The Staff revised proposal modifies subsections 20 VAC 5-312-90 I 8 b and 20 VAC 5-312-90 I 8 c, which required providing on the bill a "24-hour toll-

Cooperative, Shenandoah Valley Electric Cooperative, Southside Electric Cooperative, Inc., and the Virginia, Maryland & Delaware Association of Electric Cooperatives.

free telephone number for customer inquiries and complaints” for the billing party and non-billing party, respectively. To clarify the intent of the rules, the revised proposal eliminates the “24-hour” reference, which should address the Cooperatives’ concerns regarding an increased staffing requirement to provide 24-hour coverage to respond to customer inquiries and complaints.

The Staff did not intend the proposed rules to require 24-hour staffing of the customer service function. The Staff expects such a function would be sufficiently staffed, at a minimum, during normal business hours to provide prompt access and response to customers with billing or other inquiries. Outside of normal working hours, the Staff expects that a recorded message would direct customers with a service emergency to the appropriate immediate-response personnel and inform customers with billing or other inquiries of normal business hours.

Additionally, Cooperative witness Gillispie appears to suggest in his direct testimony that a toll-free telephone number for each party presenting billing charges should not be displayed in order to save bill space:

The Cooperatives feel that mandating 24-hour a day customer access for inquiries and complaints is unnecessary. This requirement, and the additional lines on the bill it mandates, could be eliminated. [page 12, lines 3-6]

If such a proposal is being offered, the Staff strongly disagrees. The provision of telephone numbers on the bill for inquiries is a reasonable customer service requirement. The receipt of a bill initiates most customer

inquiries and complaints. It is logical and efficient that billing statements provide a clear and convenient means for seeking resolution. The listing of telephone numbers requires significantly less bill space than a full listing of dispute resolution procedures.

Other revisions to the Staff's proposed rules do not appear to alleviate the main concerns of the Cooperatives.

Q6. WHAT APPEAR TO BE THE COOPERATIVES' MAIN CONCERNS WITH THE STAFF PROPOSED BILLING AND PAYMENT RULES?

A6. In his direct testimony, Cooperative witness Gillispie states:

The Cooperatives first and foremost concern about the proposed billing rules is the economic impact the rules will have on our members [page 3, lines 15-17];

Staff recommends extensive use of the bill to educate "non-shopping" customers about competition, without much regard for the additional cost this imposes on the customer, particularly the Cooperatives' customers [page 7, lines 10-13]; and

The Cooperatives absolutely do not object to education of the consumer. The Cooperatives do object, however, to inappropriately using the bill as an educational medium at increased expense to those customers...This is of particular concern in light of the special regulatory revenue tax provided for in subsection 56-592.1.E of the Code of Virginia that is now being collected to support education programs. This tax is being paid each month by customers as a component of the consumption tax. With the added expense of providing educational information on the bills, customers are, in effect, making dual payments for the costs of the education effort. [page 8, lines 9-12 and 16-23]

In short, the Cooperatives apparently object to the use of the bill to support and enhance consumer education efforts and the resulting cost impact on Cooperative members.

Q7. IS IT APPROPRIATE FOR THE COMMISSION TO CONSIDER EDUCATIONAL ASPECTS IN ITS DEVELOPMENT OF BILLING INFORMATION STANDARDS?

A7. Yes. In its role as policy implementation advisers, the Staff believes that a reasonable interpretation of § 56-592 of the Code of Virginia indicates that the Commission's billing information standards should consider, complement, and enhance consumer education efforts. Further, § 56-596 of the Code of Virginia directs the Commission to consider the goal of advancing competition in all relevant proceedings regarding the implementation of electric industry restructuring. Certainly, given the significant impact that restructuring will have on consumers, minimal requirements for bill information that complement the education program by helping consumers understand their choices, usage characteristics, and regulated costs are consistent with this directive.

The Staff is not alone in advocating this perspective. For example, in comments submitted on April 6, 2001, regarding the Staff Report On Proposed Rules Governing Retail Access To Competitive Energy Services,

dated March 13, 2001, the Division of Consumer Counsel, Office of the Attorney General states:

The report notes three proper objectives for these rules [Billing and Payment 20 VAC 5-312-90]: (1) enhance customer understanding of the distinction between distribution service and supply service; (2) provide price-to-compare information, which is essential for a customer to make an informed choice; and (3) provide historical energy usage data to assist consumers in understanding their consumption patterns. [page 14]

The requirements of this rule [20 VAC 5-312-90 I], which establish minimum billing information and standards, are necessary for the successful introduction of retail choice. Indeed, the importance of these standards is highlighted by the General Assembly's explicit requirement that the "Commission shall also establish standards for billing information to be furnished by public service companies, suppliers, aggregators or any other providers of services made competitive..." (Va. Code Ann. § 56-592.D.) These bills will serve a customer education function. [page 16]

Customers' bills provide a unique opportunity, through repetition and universal coverage, to reinforce certain key points that consumers need to understand, including which services may and may not be procured competitively and the meaning of common terminology. Appropriate use of the bill for such limited and focused objectives should enhance customers' comprehension of and receptiveness to consumer education communications regarding restructuring. Further, the bill, to a limited but important extent, offers an opportunity to place the broader mass media education message in a more personalized context as regards costs, usage, and price impacts.

Q8. PLEASE COMMENT ON THE COOPERATIVES' CONCERN REGARDING THE ECONOMIC IMPACT THE PROPOSED RULES WILL HAVE ON THEIR MEMBERS.

A8. The cost impact associated with the implementation of electric industry restructuring, including the development of retail access rules, is certainly an appropriate factor that must be considered by the Commission. However, it should not be viewed as the most important or only factor, but rather as one of several balancing factors that the Commission must consider in carrying out its primary objective as directed by the General Assembly to promote and advance the competitive restructuring of the electric industry in Virginia.

In deciding to pursue a policy of industry restructuring, the General Assembly was aware that transaction costs, including those associated with billing as well as other system modifications, would increase as a result of the vertical disintegration of incumbent electric utilities. The General Assembly decided that the benefits of competitive restructuring outweigh such costs. Accordingly, it is inappropriate to isolate and focus on a relatively minor component of such total restructuring costs outside of this larger context. The Staff believes the comments submitted by the Consumer Counsel regarding the Staff report presenting the proposed rules are instructive to this broader context:

Meeting these objectives [the bill's inclusion of information that is instructive and easy to understand] obviously requires significant changes to the customer's bill, as referenced in these rules. The

Report [Staff report on proposed rules] notes, however, that some LDCs claim that these bill changes will require significant system changes. (See Report at 71.) Unfortunately, the General Assembly has mandated significant changes in how consumers buy electricity. And the General Assembly has mandated that the Commission establish specific billing standards to reflect these significant changes. (Va. Code Ann. § 56-592.D.) We should not be surprised that these significant statutory changes necessitate significant system changes. [page 16]

Within this larger context, the Staff believes its revised proposed billing and payment rules are limited and focused in objective, and are critically important to providing consumers with a minimal amount of restructuring information. In the Staff's opinion, the value and benefits of the revised proposed rules in promoting and advancing competition through the provision of such consumer information, in general, reasonably balance considerations of cost.

Q9. DOES THE STAFF BELIEVE THAT THE COST ANALYSIS PROVIDED BY COOPERATIVE WITNESS GILLISPIE JUSTIFIES ELIMINATION OR MODIFICATION OF THE PROPOSED RULES?

A9. No. Mr. Gillispie provides an analysis and estimate of the increased cost required for Mecklenburg Electric Cooperative to comply with the proposed rules. His analysis indicates the need for up-front capital outlays of \$147,407.28 for a new mail inserting machine and two personal computers and increased on-going annual operating expenses, including depreciation expense, postage, paper goods, software, and labor costs, of \$115,194.58 for

a customer base of 29,415. The Staff notes that the estimated annual per-customer impact of this increased operating expense is \$3.92, approximately 33 cents per month. Financing cost of the equipment might add another 2 or 3 cents per month. This amount is significantly less than one-half of one percent of the monthly bill of a Mecklenburg customer using 1,000 kWh.

Appropriately, Mr. Gillispie notes there may be significant additional expenses such as programming costs. As Mr. Gillispie also notes, the sample bill prepared to comply with requirements of the proposed rules, included as Exhibit RGG-1 of his testimony, is deficient in clarity and would require formatting and presentation modifications. It is even possible that a newer and more flexible billing system is needed. At the same time, there may be opportunities to recover some of these increased expenses through charges to competitive service providers for the incremental costs associated with the provision of consolidated billing. There may also be opportunities for two or more Cooperatives to collaboratively upgrade billing systems to realize cost savings. In any event, the Staff does not believe sufficient evidence has been offered at the current time to justify elimination or modification of the proposed rules.

The Staff notes that the proposed rules include a provision providing the opportunity for a waiver request, should one or more of the Cooperatives believe their specific and unique circumstances justify such a request with respect to the final Commission-approved rules.

Q10. COOPERATIVE WITNESS GILLISPIE INDICATES THAT SPECIFIC SECTIONS OF THE RULES UNNECESSARILY ADD TO THE LENGTH OF THE BILL. DOES THE STAFF AGREE?

A10. No. Mr. Gillispie states subsections 20 VAC 5-312-90 I 1, 20 VAC 5-312-90 I 3, 20 VAC 5-312-90 J 1 and 20 VAC 5-312-90 J 2 are examples of rules that inappropriately increase the length of the bill for educational purposes. Subsection 20 VAC 5-312-90 I 1 only requires “Sufficient information be provided **or referenced** on the bill so that a customer can understand and calculate the billing charges.” (Emphasis added). The phrase, “or referenced,” was incorporated by the Staff to provide flexibility and address concerns expressed by some work group participants. Specifically, some local distribution companies did not display rate components contained within tariffs on the bill, but made tariffs available on the internet and/or provided a copy upon the request of a customer. Given the flexibility afforded by the proposed subsection, the Staff does not understand how it would have a significant impact on bill length. The Staff’s intent is that sufficient information to calculate billing charges is **readily accessible** by customers, through either presentation on the bill or through other means.

Subsections 20 VAC 5-312-90 I 3 and 20 VAC 5-312-90 J 1 require the use of standard billing terminology for five categories of basic billing charges: (1) distribution service; (2) competitive transition charge; (3)

electricity supply service or natural gas supply service; (4) state and local consumption tax; and (5) local utility tax. The Staff believes the use of standard terminology for basic service components is absolutely essential if consumers are to comprehend communications from the statewide consumer education program. Use of different terminology among various parties to refer to the same basic service would create significant consumer confusion. While it may be appropriate and desirable, there is no requirement to provide further detail of these categories of charges other than the specification of non-routine charges such as deposit requests and late payment fees. With respect to customers that procure competitive energy services, the minimum required level of billing line detail is consistent with that required by statute.

For non-shopping customers, additional bill space may be required for unbundling electric service charges into distribution service and electricity or natural gas supply service (two lines instead of one) and providing a brief explanation of both. The Staff does not intend that the explanations be lengthy. They should simply convey the basic concept of two services, distribution service that will continue to be provided by the local distribution company, and electricity or natural gas supply service that may be procured competitively and, if applicable, may be subject to an additional competitive transition charge. This requirement will increase bill length by a few lines; but it delivers and reinforces critical information concerning consumer

choices and restructuring to non-shopping customers. For example, such explanations might be similar to the following:

Distribution service is the delivery of electricity to your home (or business) over the Cooperative's power lines and must be purchased from Mecklenburg at regulated rates.

Electricity supply service is the generation and transmission of electricity to Mecklenburg's distribution facilities and may be procured from the competitive market. In exercising this choice, you will be subject to a competitive transition charge in addition to the charges of your supplier. Your estimated competitive transition charge that would have been applicable in this billing period is \$x.xx.

Subsection 20 VAC 5-312-90 J 2, as revised, requires the provision of a non-shopping customer's monthly energy consumption, numerically or graphically, for the previous 12 months. The Staff's revision decouples this provision from 20 VAC 5-312-90 J 3 and eliminates the option of providing twelve-months cumulative consumption data, consistent with the suggestion of the Consumer Counsel. This requirement requires a limited amount of additional bill space; however, given the volatility of electricity prices in the wholesale market, the Staff believes it will become increasingly important for consumers to be aware of their usage patterns to recognize competitive opportunities. As electric restructuring progresses, the Staff believes that improved pricing signals may increasingly migrate from the wholesale market to the retail market.

Q11. DOES THE STAFF HAVE ANY OTHER COMMENTS ON THE COOPERATIVES' DIRECT TESTIMONY?

A11. Yes. Cooperative witness Gillispie states that proposed subsection 20 VAC 5-312-90 M provides competitive service providers with too much space on the Cooperatives' consolidated bill, 10 bill lines, at the expense of the Cooperatives and their members. Additionally, the Cooperatives object to proposed subsection 20 VAC 5-312-90 N, which requires the local distribution company to continue to bill customers on its consolidated bill for former competitive service provider arrearages for two billing cycles. With respect to both these issues, the Staff notes that competitive service providers do not have the automatic option of directly billing customers in the service territories of the Cooperatives. Given this circumstance, these two requirements appear modest and reasonable to the Staff.

Q12. WHAT ARE YOUR CONCLUSIONS AND RECOMMENDATIONS?

A12. Staff concludes that the proposed rules 20 VAC 5-312-90 I 1, 20 VAC 5-312-90 I 3, 20 VAC 5-312-90 I 8 b, 20 VAC 5-312-90 I 8 c, 20 VAC 5-312-90 J 1, 20 VAC 5-312-90 J 2, 20 VAC 5-312-90 L, 20 VAC 5-312-90 M, 20 VAC 5-312-90 N, and 20 VAC 5-312-90 O, as modified in the Staff's revised proposed rules filed with the Commission on May 4, 2001, are reasonable, balanced, and necessary for the Commission to fulfill its charge under statute to advance competition. Accordingly, the Staff recommends that the Commission adopt these rules.

Q13. DOES THIS CONCLUDE YOUR TESTIMONY?

A13. Yes.

REVISIONS TO SELECTED PROPOSED RULES**GOVERNING RETAIL ACCESS****TO COMPETITIVE ENERGY SERVICES****20 VAC 5-312-90. Billing and payment.**

I. The local distribution company and a competitive service provider shall comply with the following minimum billing information standards applicable to all customer bills:

1. Sufficient information shall be provided or referenced on the bill so that a customer can understand and calculate the billing charges.

3. Standard terminology shall be employed and charges shall be categorized for the following key bill components, as applicable: (i) distribution service; (ii) competitive transition charge; (iii) electricity supply service or natural gas supply service; (iv) state and local consumption tax; and (v) local (or locality name) utility tax. The bill may provide further detail of each of these key components as appropriate.

8. The following additional information shall be provided on customer bills to the extent applicable:

b. Billing party name, payment address, and toll-free telephone number for customer inquiries and complaints.

c. For consolidated bills, non-billing party name and toll-free telephone number for customer inquiries and complaints.

J. The local distribution company shall comply with the following additional billing information standards applicable to the bills of customers that are not subject to demand-based billing charges and that purchase regulated electricity supply service or regulated natural gas supply service from the local distribution company:

1. The local distribution company shall employ standard terminology and categorize charges for the following key billing components: (i) distribution service; (ii) electricity supply service or natural gas supply service; (iii) state and local consumption tax; and (iv) local (or locality name) utility tax. Brief explanations of distribution service and electricity supply service or natural gas supply service shall be presented on the bill. Such explanations shall convey that distribution service is a regulated service that must be purchased from the local distribution company and that electricity supply service or natural gas supply

service may be purchased from the competitive market but, if applicable, may result in a competitive transition charge. An estimate shall be provided of the competitive transition charge for the current month that would have been charged if the customer had purchased electricity supply service from a competitive service provider;

2. The local distribution company shall provide on customer bills a customer's monthly energy consumption, numerically or graphically, for the previous 12 months; and

L. The electric cooperative local distribution company and the natural gas local distribution company shall develop and file a plan, prior to the implementation of full or phased-in retail access, with the State Corporation Commission's Division of Energy Regulation to provide "price-to-compare" assistance and information, on bills or by other means, to all customers.

M. The local distribution company shall provide sufficient space on a consolidated bill to accommodate a competitive service provider's name and toll-free telephone number, previous account balance, payments applied since the previous billing, total current charges, total amount due, six additional numeric fields to detail current charges, and 240 additional text characters.

N. The local distribution company shall continue to track and bill customer account arrearages owed to former competitive service providers for two billing cycles after service has terminated. The bill shall list, at a minimum, the name, toll-free telephone number, and balance due for each former competitive service provider.

O. If the current charges of a competitive service provider are not included on the consolidated bill issued by the local distribution company, the bill shall note that such charges are not included.